

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA

v.

PETER MAGGIO, et al,

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CR. NO. 04-10231-MLW

**MOTION TO EXTEND THE TIME FOR DEFENDANT PARADISO  
TO FILE PROPOSED *VOIR DIRE* QUESTIONS,  
PROPOSED JURY INSTRUCTIONS AND MOTION *IN LIMINE***

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Defendant, Louis Paradiso, by and through his attorney, Scott P. Lopez, hereby moves to extend the time to file his proposed *voir dire* questions, proposed jury instructions and motions *in limine* with supporting memoranda for an additional seventeen (17) days from today, March 24, 2006, until Monday, April 10, 2006.

In support of this motion, undersigned counsel states the following:

1. Since March 14, 2006, undersigned counsel has been preparing for a trial before the Court in *United States v. Antoin Quarles Combs*, Criminal Number 05-10237-MLW, which is scheduled to begin on Monday, March 27, 2006.

2. On March 3, 2006, undersigned counsel reported to the United States Attorney's Office that the above-reference case was going to be a plea of guilty only to learn on March 13, 2006, after negotiating a plea agreement in the case, that defendant decided to proceed to trial.

3. As a result, undersigned counsel has been preparing for trial before the Court and has not been able to prepare the proposed *voir dire* questions, proposed jury instructions and motions *in limine* with supporting memoranda due today.

5. Finally, this brief extension of time will only affect the original response deadline of April 7, 2006. However, if the response deadline is also extended until April 24, 2006, no other deadlines including the trial date will be affected.

WHEREFORE, defendant Louis Paradiso respectfully requests the Court to grant this motion and extend the time for filing his proposed *voir dire* questions, proposed jury instructions and motions *in limine* with supporting memoranda for an additional seventeen (17) days from today, March 24, 2006, until Monday, April 10, 2006.

Respectfully submitted  
By Defendant,  
LOUIS PARADISO  
By his attorney

/s/ Scott P. Lopez  
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Scott P. Lopez  
Law Office of Scott P. Lopez  
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Boston, MA 02108  
(617) 742-5700

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I attempted to confer with counsel for the government, Assistant U.S. Attorney Victor Wild, by telephone today, in a good faith attempt to resolve or narrow the issue in this motion, but was unable to speak to him..

/s/ Scott P. Lopez  
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Scott P. Lopez

CERTIFICATE OF SERVICE

I, Scott P. Lopez, hereby certify that on the 17<sup>th</sup> day of February, 2006, I served the within MOTION TO EXTEND THE TIME FOR DEFENDANT PARADISO TO FILE PROPOSED VOIR DIRE QUESTIONS, PROPOSED JURY INSTRUCTIONS AND MOTION *IN LIMINE* by electronic mail on the following counsel of record at the following address:

Victor Wild  
Assistant United States Attorney  
United States Attorney Office  
One Courthouse Way, Suite 9200  
Boston, MA 02210  
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Victor.Wild@usdoj.gov

/s/ Scott P. Lopez

Scott P. Lopez